


**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT**

DEC 27 2023

for the  
Western District of TexasCLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY   
DEPUTY CLERKUnited States of America  
v.  
Jose Antonio LOPEZ LopezCase No.  
DR:23-M-03482

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/22/2023 in the county of Val Verde in the  
Western District of Texas, the defendant(s) violated:*Code Section*

18 U.S. Code § 554

*Offense Description*

Fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet.*Complainant's signature*

Eric B. Walker, HSI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

12/27/23

City and state:

Del Rio, Texas*Judge's signature*

Matthew Watters, United States Magistrate Judge

*Printed name and title*

## **Attachment "A"**

On December 22, 2023, Jose Antonio LOPEZ Lopez (LOPEZ), a United States Citizen, arrived at the Del Rio, Texas Port of Entry (POE), Outbound and destined for Mexico, as the driver and sole occupant of a 2005 Chevy Silverado (TX License Plates RSD9827). LOPEZ stated he had nothing to declare and was selected for a Secondary Inspection. During secondary inspection, Customs and Border Protection Officers (CBPOs) located one [1] loaded .45 ACP Handgun, three [3] loaded .45 ACP magazines, 34 rounds of .45 ACP ammunition, 200 rounds of 9mm ammunition and forty [40] 30 round AR rifle magazines concealed within the vehicle. A Homeland Security Investigations (HSI) Del Rio special agent (SA) was present during the encounter and provided investigative assistance.

At the Del Rio POE, LOPEZ was read his Miranda rights by HSI SAs in the English language. LOPEZ waived his Miranda rights both verbally and in written form and chose to speak to the Investigators. During the post-Miranda interview, LOPEZ freely admitted to knowingly purchase, conceal, transport and attempt to illegally export firearms from the United States (US) to Mexico (MX) in collaboration with a third party. LOPEZ stated the third party intended to compensate him financially for his efforts.

LOPEZ stated that he had made multiple previous trips, when he had successfully transported other firearms-related material through the Del Rio POE, in collaboration with the same third party and was provided financial compensation for those trips.

The facts of the case were presented to Assistant United States Attorney (AUSA) Katherine Gorski, who accepted federal prosecution of LOPEZ for a violation of 18 U.S. Code § 554, Fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.